

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Metal Bank of America State Road - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #5
Submittal of Draft "Final Report" by PADOT
Metal Bank of America State Road
A3DE
Philadelphia, PA
Latitude: 40.0203300 Longitude: -75.0389500

To: Ragesh Patel, DEP
Gerald Heston, EPA
Response Center RRC, EPA
Response Center RRC, EPA

From: Michael Towle, On-Scene Coordinator

Date: 3/14/2016

Reporting Period: 11/10/2015 through 3/14/2016

1. Introduction

1.1 Background

Site Number:	A3DE	Contract Number:	
D.O. Number:		Action Memo Date:	9/28/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/28/2015	Start Date:	4/20/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This Site is the location of a release of hazardous substances into soil which has subsequently migrated into a combined sewer system allowing hazardous substances to migrate from the Site and into the nearby Delaware River.

1.1.2 Site Description

The Site includes an area of soil contaminated by polychlorinated biphenyls (PCBs) now covered by asphalt. A combined storm and sanitary sewer system (drainage system) underlies the Site and exists within the area of contaminated soil. PCBs have been detected in the liquids and solids within the drainage system at concentrations which indicate that PCBs are migrating from the soil at the Site and

then into the drainage system.

1.1.2.1 Location

The Site is located along State Road in the City of Philadelphia, Pennsylvania. The Site is located immediately northeast of the intersection of State Road and Knorr Street.

1.1.2.2 Description of Threat

PCBs release from the soil at the Site and into the combined storm and sanitary sewer that courses under the Site. The contaminated drainage either migrates to the POTW or, in high flow periods, to the Delaware River. PCBs are known to bioaccumulate in fatty tissue and pose a threat to those consuming fish removed from the Delaware River. See Action Memo dated September 28, 2011 for a more thorough description of the Site threats.

Based upon the results of a removal site evaluation, the OSC proposed and EPA Region III selected a Removal Action intending to reduce the off-site migration of PCBs from the Site. An Action Memorandum was signed September 28, 2011 selecting the installation of a liner system inside the drainage in order to minimize the migration of PCBs from the soil into the combined sewer and then off-site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Prior POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The bulk of the scope of the Removal Action was accomplished by PADOT pursuant to an Administrative Settlement Agreement entered between EPA and PADOT on April 20, 2015. Under the Agreement, PADOT and its contractors arranged for the cleaning of the drainage system (combined storm water and sanitary water system) underlying and coursing through the Site and the subsequent installation of a liner system within. The liner system should prevent infiltration into the drainage system of potentially contaminated liquids originating from within the PCBs-contaminated soils at the Site.

See prior POLREPs for summary descriptions of previous actions.

The EPA OSC conducted oversight of the actions.

2.1.2 Response Actions to Date

See Prior POLREPs.

All onsite work required by PADOT pursuant to the Settlement Agreement is completed. The disposal of the wastes removed from the Site is completed. 17.28 tons of PCB Remediation Wastes were disposed at Waste Management's landfill facility in Tulleytown, PA.

On February 17, 2016, PADOT submitted a draft of the Final Report summarizing the activities which occurred at the Site. The OSC completed review of this Report on March 14, 2016. Only certification of the costs remains to be completed.

Additional work is required. EPA is still evaluating whether such work is to be accomplished by a PRP Group or by EPA.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

There are several responsible parties relating to this Site and EPA enforcement personnel have sent notice letters and are keeping these PRPs informed. The PRP Group sent a representative to the Site to observe all initial activities relating to cleaning (activities relating to the liner were not observed). The OSC coordinated with a representative of the Site owner during the activities and controlled gate access. EPA anticipates working with the PRP Group relating to the completion of the removal action which

involves improvements to the asphalt cover to minimize infiltration (this work not anticipated until Spring 2016).

EPA and PADOT entered into an Administrative Settlement Agreement on April 20, 2015. Under the Agreement, PADOT installed a liner in the existing combined drainage system. The PADOT work satisfied a large portion of the selected response action. EPA is now contemplating completion of remaining work under a possible enforcement instrument.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
PCBs	Debris	10.34 T	909761		LF
PCBs	Debris	6.94 T	909762		LF

2.2 Planning Section

2.2.1 Anticipated Activities

PADOT to certify costs.

Further response actions to complete the scope of the Removal Action selected in the Action Memorandum include activities to further reduce infiltration through the asphalt cover. EPA will work towards addressing this remaining work with a PRP Group now being identified for the Site. This coordination is expected to take some time and the work activity is likely to be best conducted in warmer weather anticipated next spring (as it will likely involve application of asphalt sealant).

2.2.1.1 Planned Response Activities

None immediately planned.

2.2.1.2 Next Steps

Await Cost Certification from PADOT.

Work with PRP Group to accomplish completion of Removal Action.

2.2.2 Issues

The OSC believes that application of asphalt sealant is the likely next step and this work may be best accomplished this spring with warmer weather.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

A Special Account is set up for this Site with monies derived from potential responsible parties. Entities conducting response work at the Site are eligible for reimbursement from the account. The OSC monitored the work to assure effort to be consistent with the Agreement and the Action Memorandum. As such, the construction activity conducted by PADOT may be reimburseable from the Special Account.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Settlement Agreement	\$0.00	\$579,314.00	(\$579,314.00)	0.00%
Intramural Costs				
Total Site Costs	\$0.00	\$579,314.00	(\$579,314.00)	0.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.